

UNITED STATES DISTRICT COURT
for the
DISTRICT OF MASSACHUSETTS

EK VENTURES I, LLC; DAVID L. TAYLOR;
DAVID L. TAYLOR AND VIRGINIA L.
TAYLOR as TRUSTEES FOR THE TAYLOR
FAMILY REVOCABLE TRUST; and
FLEXTRONICS INTERNATIONAL LTD.,

Plaintiffs,

v.

JAMES R. BARTLETT and Z.B.R.
PUBLICATIONS, INC.,

Defendants.

and

JAMES R. BARTLETT,

Third Party Plaintiff

v.

GLOBALWARE SOLUTIONS, INC.,
ANTHONY RUDSTON and BRADLEY A. JAY,

Third Party Defendants.

CIVIL ACTION No. 03 CV 12506 NMG

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**AFFIDAVIT OF DOUGLAS R. ROACH IN SUPPORT OF PLAINTIFFS' MOTION TO
COMPEL DISCOVERY RESPONSES FROM DEFENDANT JAMES R. BARTLETT**

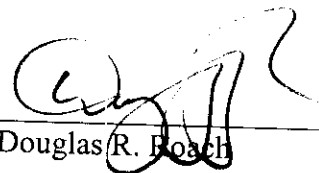
Douglas R. Roach hereby declares as follows:

1. I am an attorney with Groff Murphy Trachtenberg & Everard PLLC, counsel for Plaintiffs in the above-captioned matter. I have personal knowledge of the facts and circumstances herein, and I am competent to testify thereto.

2. On Monday, November 22, at 2:00 p.m., I spoke by telephone with Tom Fitzpatrick, counsel for Defendant James Bartlett, to discuss Bartlett's responses to Plaintiffs' First Interrogatories and Requests for Production of Documents.

3. During that conversation, Mr. Fitzpatrick stated his belief that Document Request Nos. 26, 27, and 30 were overly broad, so Bartlett would not respond to them. I stated my disagreement with Mr. Fitzpatrick's position, and we were not able to resolve our difference of opinion on those items during that conference.

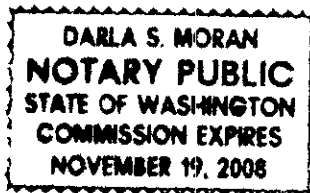
Dated this 24 day of November, 2004 at Seattle, Washington.


Douglas R. Roach

State of Washington) ss.
County of King _____)

On this day personally appeared before me Douglas R. Roach to me known to be the individual described in and who executed the within and foregoing instrument, and acknowledged that he signed the same as his free and voluntary act and deed, for the uses and purposes therein mentioned.

Given under my hand and official seal this 24th day of November, 2004.



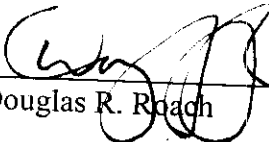

Print Name: Darla S. Moran

NOTARY PUBLIC in and for the State of
Washington, residing at 4906 N. Baltimore, Ruston,
WA 98407

My Appointment Expires: 11/19/08

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on counsel for all parties via first-class mail/electronically on November 24, 2004.



Douglas R. Roach